Attorneys for LinkUs Enterprises LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SALVADOR MARTINEZ, in behalf of himself and all others similarly situated,

Plaintiff,

v.

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LINKUS ENTERPRISES LLC; DOES 1 through 50; inclusive,

Defendants.

CASE NO.: 2:21-cv-01119-RFB-EJY

NOTICE OF SETTLEMENT AND STIPULATION AND ORDER TO VACATE **DEADLINES**

Defendant LinkUs Enterprises LLC ("Defendant") and Plaintiff Salvador Martinez ("Plaintiff") have reached a settlement of Plaintiff's individual claims, which will include an agreement to dismiss this action in its entirety with prejudice as to Plaintiff's individual claims, and without prejudice as to the class and collective claims.

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Case 2:21-cv-01119-RFB-EJY Document 22 Filed 09/27/21 Page 2 of 2

| | 1 | In light of this settlement, the part | ties stipulate and request that all pending deadlines |
|---------------------------------------|--|--|---|
| | 2 | (including discovery deadlines and Defen | idant's deadline to respond to Plaintiff's Amended |
| | 3 | Complaint) be vacated. The parties are in the | he process of preparing formal settlement documents, |
| | 4 | and request the Court allow the parties to | submit a Joint Motion to Approve Settlement on or |
| | 5 | before October 25, 2021. | |
| | 6 | Dated this 24th day of September, 2021. | |
| | 7 | McDONALD CARANO LLP | THIERMAN BUCK LLP |
| PHONE 702.873.4100 • FAX 702.873.9966 | 8 9 10 11 12 13 14 15 16 17 | By: /s/ Daniel I. Aquino Kristen T. Gallagher (NSBN 9561) Daniel I. Aquino (NSBN 12682) 2300 West Sahara Avenue, Suite 1200 Las Vegas, Nevada 89102 kgallagher@mcdonaldcarano.com daquino@mcdonaldcarano.com Attorneys for LinkUs Enterprises LLC | By: |
| | 18 | | Attorneys for Plaintiff |
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| | 20 | IT IS SO ORDERED. | |
| | 21 22 | September 27, 2021 Date | Cayro J. Zouchah UNITED STATES MAGISTRATE JUDGE |
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